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June 9 1993

93 RF 5831

J K Hartman
Assistant Manager for Transition
and Environmental Restoration
DOE RFO

Attn P Singh

OPERABLE UNIT NO 1 (OU 1) CORRECTIVE MEASURES STUDY/FEASIBILITY STUDY (CMS/FS) AND DOWNSTREAM MILESTONES SCHEDULE EXTENSION REQUEST RLB 226 93

Ref G W Baughman and M Hestmark Itr to R Schassburger OU 1 Remedial Investigation Report Extension Request April 2 1993

This letter is to advise DOE/RFO of the need for an extension request for the OU 1 CMS/FS and downstream milestones schedule. This extension request is in response to the above referenced letter from the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) although a formal response was not requested. EPA/CDH have established February 11 1994 as the IAG milestone date for the Draft CMS/FS. This date is not reasonable and EG&G cannot commit to its attainment. The dates originally requested by EG&G on March 19, 1993 were based on the fact that a critical information transfer must occur between the Baseline Risk Assessment (BRA) in the RCRA Facilities Investigation/Remedial Investigation (RFI/RI) and Technical Memorandum No, 10 (TM 10) establishes Remedial Action Objectives. Remediation Goals and ARARs for the CMS/FS. As indicated by the attached schedule. TM 10 is scheduled to correspond with revision of the BRA. Regulatory agency concurrence will be necessary at this juncture to assure that TM 10 is based on an acceptable BRA. Note that this concurrence is accelerated and will actually have to take place before the RFI/RI (and BRA) are formally submitted to the agencies on November 15, 1993.

Based on our efforts to develop a reasonable schedule we propose that DOE/RFO seek agency concurrence for the IAG milestones presented on the attached Table 1 which addresses all remaining deliverables through the Corrective Action Decision/Record of Decision (CAD/ROD). The milestones proposed in Table 1 reflect the same inter deliverable durations specified in Table 6 of the IAG. The principal reason for this extension request as discussed above is the need to coordinate RFI/RI revisions with the CMS/FS. In order to do this a 41-day extension is necessary for the Draft CMS/FS (March 24 1994 versus February 11 1994). This effects a cascade through the remaining downstream milestone deliverable dates. The draft Remedial Action Plan cannot logically be submitted before the FS work is completed.

This schedule will permit EG&G to incorporate revised RFI/RI data including the Hot Spot investigation and BRA findings appropriately. It also permits the internal review and revision periods contained in the IAG. Key assumptions in this schedule include.

Analytical data from the Hot Spot investigation is received by August 1 1993

The BRA is revised by September 1 1993

ADMIN RECORD

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ACTION ITEM STATUS

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Agency concurrence with the BRA findings is obtained by mid September 1993 to permit completion of TM 10

TM 11 is delivered to the regulatory agencies by October 29 1993 and agency comments do not require significant development or refinement of alternatives

Funding is approved in the FY94 work package so that tasks after TM 11 commence on time

Questions on this matter may be referred to C B Gee of Remediation Project Management at

extension 8550

R L Benedetti

Associate General Manager

Environmental Restoration Management

CBG dmf

Ong and 1 cc J K Hartman

Attachment As Stated